

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

TIMOTHY JACKSON,
Plaintiff,

v.

LAURA WRIGHT, et. al.,
Defendants.

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Civil Action No. 4:21-cv-00033

DECLARATION OF RENALDO STOWERS

STATE OF TEXAS §
 §
COUNTY OF DENTON §

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I, RENALDO STOWERS, am of sound mind, am over the age of 21, and am fully competent and qualified to make this declaration. All of the facts set forth below are true and correct and are known to me pursuant to my own personal knowledge.
2. I am an attorney in the University of North Texas System Office of General Counsel. The UNT System Office of General Counsel is responsible for providing legal services and advice to officials and employees in the UNT System, including employees of the University of North Texas ("UNT"). I have been employed as an attorney in the UNT System Office of General Counsel for over 20 years.
3. I have reviewed the subpoenas issued to Jennifer Cowley, Benjamin Brand, Jincheng Du, Francisco Guzman, John Ishiyama, Matthew Lemberger-Truelove, and Jennifer Wallach (the "Subpoenaed Individuals") in the above-styled case. The Subpoenaed Individuals are employees of UNT. Jennifer Cowley is Provost and Vice President for Academic Affairs. Benjamin Brand is Chair of the Division of Music History, Theory and Ethnomusicology. Jincheng Du, Francisco Guzman, John Ishiyama, Matthew Lemberger-Truelove, and Jennifer Wallach are faculty members of UNT and were members of the panel that reviewed the practices and procedures used in publishing Volume 12 of the Journal of Schenkerian Studies.



4. Based on my review of documents responsive to the subpoenas issued to the Subpoenaed Individuals, the subpoenas seek the production of documents that are covered by the attorney-client privilege. Documents responsive to the subpoenas include communications between each of the Subpoenaed Individuals and myself in which I provided legal advice regarding litigation threatened by Plaintiff before the filing of the above-styled action, and advice regarding responsibilities related to the review conducted by the panel. I was acting in my capacity as an attorney for UNT at all times during which the communications were sent and received. Documents responsive to the subpoenas also include ones prepared for the purpose of the above-styled litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Denton County, State of Texas, on the 26th day of May, 2021.



Renaldo Stowers